

## Exhibit 190

Plaintiffs' Corrected Averment of Jurisdictional Facts and  
Evidence and/or Statement of Facts as to Defendant Al Rajhi Bank  
Pursuant to Rule 56.1

An investigator said the plane, which was built for four seats but carrying seven, could have been overloaded with too much weight.

The unidentified woman jumped to safety just as the plane went into its fatal spin.

The Cessna 210 took off from Homestead General Airport and crashed about a mile away, its frame flattened and engulfed by flames in a field in a rural farming district between Miami and the Everglades.

National Transportation Safety Board investigator Jeffrey Kennedy said the plane may not have been going fast enough after making a turn. "It's not a mechanical failure," he said.

## GM workers end strike

The Associated Press

OKLAHOMA CITY — United Auto Workers members voted Sunday to resume work at a General Motors Corp. assembly plant while studying a tentative accord to end a 7-week-old strike.

Employees struck the plant, which produces the Oldsmobile Cutlass and the Chevrolet Malibu, on April 4 after failing to come to terms with the nation's biggest automaker on staffing, safety and health.

The UAW workers will be paid their previous wages until a vote later this week to ratify a new local contract with GM.

## Ennis Cosby's last act

The Associated Press

NEW YORK — Ennis Cosby may have been killed while offering a cigarette to someone, *Time* magazine reported.

Crime-scene photographs shown to magazine staffers showed the slain son of Bill Cosby clutching a pack of cigarettes.

That, along with the point-blank nature of the fatal gunshot wound, support the conjectured scenario, the magazine said in its June 2 issue, citing identified forensics experts.



Among the culprits were Palestinian Islamic Jihad, which was deemed coupons for products never purchased, then sent \$100 million of that cash back to the Middle East.

Who benefited?

At least two of the major coupon fraud groups were headed by terrorists, says Nielsen's investigator, Ben Jacobson.

### Coming Tuesday

Next in the series: The Price of Freedom

In St. Louis, he says, the ringleader was Zein Isa, a U.S. commander of the Abu Nidal Organization, a group responsible for terrorist attacks that killed or injured 900 people in 20 nations. Mr. Isa later was convicted of murder.

In Brooklyn, Mr. Jacobson found a phony coupon redemption center run by Mahmud Abouhalima — now serving 240 years in prison for his role in the 1993 World Trade Center (WTC) bombing.

"Before the bombing, we couldn't get the U.S. attorney's office interested," Mr. Jacobson says. "After the bombing, they just wanted us to keep our mouths shut."

Justice Department officials would not comment, but the case makes it clear Middle East terrorists use the United States as a cash cow.

Other U.S. crimes also fill terrorist pockets, the Drug Enforcement Administration discovered.

Undercover agents say \$500 million from the sale of heroin in the United States and Europe goes to leaders of the PKK, a Kurdish separatist group identified by the State Department as the world's deadliest terrorist organization. The PKK controls drug-processing labs in eastern Turkey that sit astride the drug routes from Afghanistan to the West, investigators say.

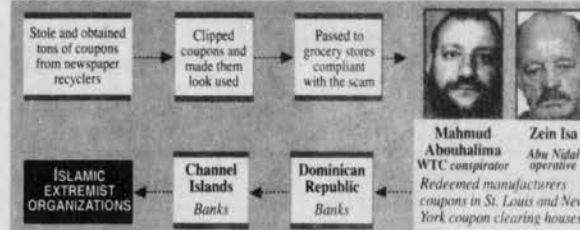
While crime is the most spectacular source, money also flows to terrorists through sleight-of-hand schemes and legal charities.

"It's a big concern for us," says Philip Wilcox, counter-terrorism coordinator for the State Department. "Money that is collected for charitable purposes is diverted for military and terrorist activities."

Tracing that money is difficult. A 1995 presidential order froze \$800,000 in funds for a list of



### COUPON SCAM



### AFGHAN DRUGS



### TEHRAN CONNECTION



offshore Channel Islands financial institutions, and then to the Middle East.

Mr. Jacobson said the conspirators stole coupons from printing plants and recycling centers, then set up centers where the coupons were wrinkled, crumpled and sometimes stuck in driers to make them look used.

They then delivered them to the manufacturers and claimed refunds in the name of cooperating grocers. Many of the rings also ran food stamp fraud scams.

### Tracing money is hard

Mr. Jacobson said it is virtually impossible to know the final destination of the money. But he notes that Miami-area grocers arrested

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— Philip Wilcox, of the State Department

felony lies the gray area of foundation money and charities providing help to terrorist-linked groups.

The U.S. Customs Service is looking into the Tampa-based World and Islam Studies Enterprise foundation, or WISE, after

when it crosses the U.S. border.

### Tough track

In recent years, federal agencies have vastly improved their ability to track those funds, but banking secrecy laws, complexity and the sheer volume of transaction makes the task daunting.

One suspect charitable organization is the Holy Land Foundation of Richardson, Texas, shut down in Israel as a fund-raising tool of Hamas.

Holy Land's U.S. branch denied any connections to Hamas and continued to raise funds in the United States.

Yet IRS records show that its single biggest contribution in the United States between 1989 and 1994 was \$210,000 from a Virginia businessman named Mousa Abu Marzook — who emerged as Hamas' political leader.

Mr. Marzook was jailed in New York after Israel arrested two U.S.-based men who claimed he had given them \$295,000 in cash and wire transfers, sending them to set up and finance terrorist cells on the West Bank. Israel, fearful of Hamas violence if Mr. Marzook was returned for trial, has now dropped the extradition request, and U.S. authorities this month expelled Mr. Marzook to Jordan.

Mr. Marzook says his only income is about \$40,000 a year from a California company he partly owns called Mecca Investment International.

But in an affidavit, FBI agent Joe Hummel said Mr. Marzook acknowledged to investigators that he raised \$900,000 from "Arab investors abroad" for Mecca Investment. Mr. Hummel also says "millions of dollars passed through Mr. Marzook's bank accounts."

While federal investigators try to untangle these money puzzles, the New York attorney general's office and the FBI have eyed a foundation connected to Iran.

The Alavi Foundation, a charity controlled by the Shah of Iran until he was overthrown by the current government, collects \$10 million a year in rents from a Park Avenue office building. The money goes to Islamic centers around the United States — including at least \$1.4 million to a Brooklyn mosque where a frequent preacher was Sheikh Omar Abdel-Rahman, later convicted in the World Trade Center bombing.

Two former top Alavi officials have been investigated for trying